Western States VHF-Microwave Society

PO box 35, Lomita, CA 90717-0035

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6-13-94

In the matter of:

Allocation of Spectrum Below
5 GHz Transferred from
Federal Government Use

ET Docket No. 94-342 94-32

RECEIVED
JUN 15 1994
FCC MAIL ROOM

Mr. William F. Canton
Acting Secretary
Federal Communications Commission
Washington, DC 20554

Re: Reallocation from government service to non-government service of spectrum shared with the Amateur Radio Service.

Dear Mr. Caton,

The Western States VHF-Microwave Society was formed several years ago to provide a common voice to express the opinions and to demonstrate the interests of weak signal operators of our VHF through microwave spectrum in the Western area of the country. Our membership now totals 147, from San Diego to Seattle, including Alaska and Hawaii, and continues to grow.

Every year at the West Coast VHF Conference we conduct a survey on matters affecting our VHF through microwave bands. This year, in addition to the written survey, a partial telephone survey of known Western 2.3 GHz users was taken to make better known present operating levels and future plans for use of the 2.3 to 2.45 GHz amateur band segments. This information was obtained in response to the NTIA task of finding shared government spectrum and it's effect on the Amateur Radio Service.

The American Radio Relay League informed the NTIA of present and future requirements for the Amateur Radio Service in the affected band segments but the NTIA did not adequately consider the impact on present users.

There are presently about four dozen active weak signal users of 2304 MHz in the Western portion of the country. These are SSB and CW users and intermittently operate during times of good tropospheric conditions and when activity will probably be high.

The amateur fast scan television community is a rapidly growing group of users as their present lower frequency allocations are becoming too congested. The ideal place for the wider bandwidth modes like video and data are in the microwave area and it is indeed gratifying to see more and more users adopt this in their systems as we have been advocating it for quite some time. It would indeed be unfortunate to see this trend reversed by the loss of key portions of our microwave spectrum allocations.

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List A B C D E

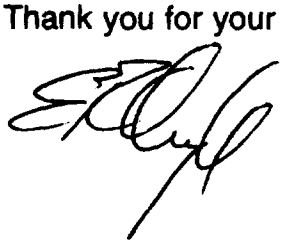
With extreme congestion on all of our VHF and UHF bands it is essential to maintain realistic spectrum for point to point linking. Many of the larger multi-repeater inter-tie systems are unable to find any frequencies for linking below one GigaHertz. New and old inter-tie systems are finding it necessary to expand upward in frequency to accommodate more users. The CMRA, California Microwave Relay Association (operates more than fifteen interconnected repeaters near 1283 MHz) has recently invested in a large quantity of commercial surplus 2.3 GHz equipment for the purpose of expanding all of it's linking capability. The Cactus Inter-tie System has been using several links on 2.3 GHz and has ongoing plans for expansion. The inadequate planning of our spectrum, that is, no provision for adequately spaced duplex frequency segments for linking, will adversely affect them as well as all future users of this and other microwave bands. It is for that reason we would like to retain some capability for duplex operation of point to point linking in the 2300 MHz and 2400 MHz areas.

While weak signal users in the ARS usually provide the first use of a microwave band segment we are not the largest nor the most consistent user of any particular band. A lot of the equipment and techniques which are ultimately incorporated by other users of the band are first developed in the weak signal community. This has been demonstrated many times over in the rapid growth of the 1240 to 1300 MHz amateur band. With over 120 NBFM repeaters, excluding linking, in operation in Southern California alone, the success of preamplifiers, filtering techniques and clean local oscillators were first demonstrated in the weak signal community long before commercial manufacturers started producing equipment for the band and their success is partly due to that demonstrated effort.

While the amateur radio satellite community is increasing it's use of the 2400 to 2402 MHz , it is satellite down links only at this moment with plans for uplinking on the next generation of satellites. That type of operation is several years away. Even now, there would be an unacceptable level of interference between the users of the satellite service and all other users that could not be tolerated in a shared segment. This has been proven time and again on our lower frequency bands.

While we in the Amateur Radio Service cannot provide the large revenues that potentially can come from commercial service allocations, we can and do provide important communications for public service, disasters, personal, educational and recreational activities.

Thank you for your consideration in this matter,



E.R. Angle
representative for the WSVMS